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August 14, 2008

VIA TELECOPIER

Fax: (212-805-6382)
Honorable Victor Marrero
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 660
New York, New York 10007-1312

USDS SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 8-25-08
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Re: Deilemar Shipping Spa v. Spot On Shipping Ltd. a.k.a. Spot On Shipping BVI
a.k.a Spot On
07 Civ. 3820 (VM)
Our File: 500126.0042

Dear Judge Marrero:

We represent Zhanggang Shipping Ltd., ("ZSL") in the above-referenced action. We have now filed a formal Notice of Restricted Appearance as you directed at the conference on July 31. At this last conference, you also suggested that the parties discuss whether the issue of ZSL's default could be resolved short of motion practice and you scheduled another conference on August 29 for the parties to report to you.

We have since consulted with the attorneys for the Plaintiff Deilemar Shipping Spa. As we mentioned in our letter to you of July 25, a hearing before the Commercial Court in London has been set for September 22 on the application by ZSL to intervene in the similar Brave Bulk case in order to have the alter ego issue decided by that court. The outcome of that proceeding may have a bearing on this case. The parties agree that it would make sense to defer the next conference in this action until after the September 22 hearing in London.

Therefore, we respectfully request that the conference in this action, currently scheduled for August 29, be adjourned to a date after September 22. In order to give the parties sufficient time to react to whatever may occur at the September 22 hearing in London, we suggest a date on or after October 1. We have discussed the aforementioned with the Plaintiff Deilemar Shipping Spa and they consent to this request for an adjournment.

We thank this Court for its attention and understanding. If there are any questions, please do not hesitate to contact us.

Respectfully submitted,

CHALOS, O'CONNOR & DUFFY, LLP



Eugene J. O'Connor
Timothy Semeno

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Enclosures

cc.: Tisdale Law Office, LLC

(via telecopier)

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Attn: Thomas L. Tisdale, Esq.
Lauren Davies, Esq.

Request GRANTED. The <u>next status</u>	
conference herein is rescheduled to <u>10-17-08</u>	
at <u>4:45 p.m.</u>	
SO ORDERED.	
<u>8-24-08</u>	
DATE	VICTOR MARRERO, U.S.D.J.